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BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

Nov 30 4 24 PM '01 POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

MOTION FOR LATE ACCEPTANCE OF RESPONSES OF POSTAL SERVICE WITNESS COCHRANE TO UPS INTERROGATORIES REDIRECTED FROM THE POSTAL SERVICE (UPS/USPS-20, 21)

The United States Postal Service hereby moves for late acceptance of the responses of Postal Service witness Cochrane to the following interrogatories of United Parcel Service: UPS/USPS-20, 21, filed on November 15, 2001, redirected from the Postal Service. These responses were delayed by one day due to the need to coordinate review with a number of functional groups within the Postal Service. The Postal Service believes that no party will be prejudiced by this short delay.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Richard T. Cooper

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–2993 Fax –5402 November 30, 2001

CERTIFICATE OF SERVICE •

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Richard T. Cooper

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–2993 Fax –5402 November 30, 2001